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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

IN RE: DMCA SECTION 512(h)  
SUBPOENA TO GOOGLE LLC

Miscellaneous Action No.:

**DECLARATION OF MATTHEW  
SLATOFF IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

I, Matthew Slatoff, the undersigned, declare that:

1. I am the Vice President, Global Security & Content Protection at Marvel Studios, LLC, which is an affiliate of (with the same parent as) MVL Film Finance LLC (“MVL”). As part of my duties, I am responsible for monitoring and addressing infringement of copyright rights owned by MVL and its affiliated companies.

2. I am authorized to act on MVL’s behalf. I submit this declaration in support of MVL’s request for issuance to Google LLC (“Google”) of a subpoena, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h)

Case No.

DECLARATION OF MATTHEW SLATOFF

(the “DMCA Subpoena”), to identify an alleged infringer (or infringers) who posted content which infringes copyright rights held by MVL in *Ant-Man and the Wasp: Quantumania* (the “Infringing Content”) on systems operated by Google, without MVL’s authorization. I have personal knowledge of the facts contained herein and, if called upon to do so, I could and would testify competently thereto.

3. On January 21, 2023, Nilo Siqueira, Analyst, Digital Media Antipiracy at The Walt Disney Company (the parent of MVL), submitted on behalf of MVL a notification, via a webform provided by Google (at [https://reportcontent.google.com/forms/dmca\\_drive?hl=en-GB&utm\\_source=wmx&utm\\_medium=deprecation-pane&utm\\_content=legal-removal-request](https://reportcontent.google.com/forms/dmca_drive?hl=en-GB&utm_source=wmx&utm_medium=deprecation-pane&utm_content=legal-removal-request)), identifying the Infringing Content on Google’s systems and providing the information required by 17 U.S.C. § 512(c)(3)(A). The information provided to Google via webform was as follows:

- First Name: Nilo
- Surname: Siqueira
- Company Name: The Walt Disney Company
- Copyright holder that you represent: The Walt Disney Company
- Email address: Nilo.siqueira@disney.com
- Choose your country/region: United Kingdom
- Is the submission related to an unauthorised stream of an upcoming live event? No
- Identify and describe the copyrighted work: Unreleased leaked script of the new Disney movie *Ant-man and the Wasp: Quantumania*
- Where can we see an authorised example of the work?:  
<https://www.imdb.com/title/tt10954600/>


- 1 • Location of infringing material:
- 2 <https://docs.google.com/document/d/1Y7adPnjTvgQFVEO6bgnbSDkD>
- 3 <GVcfiONrfQJ9gzDMzPw/>
- 4 • I have a good-faith belief that use of the copyrighted materials
- 5 described above as allegedly infringing is not authorised by the
- 6 copyright owner, its agent or the law. [Confirmed via box check]
- 7 • The information in this notification is accurate and I swear, under
- 8 penalty of perjury, that I am the copyright owner or am authorised to
- 9 act on behalf of the owner of an exclusive right that is allegedly
- 10 infringed. [Confirmed via box check]
- 11 • I understand that a copy of each legal notice may be sent to the Lumen
- 12 project (<http://lumendatabase.org>) for publication and annotation. I also
- 13 understand that Lumen redacts personal contact information from
- 14 notices before publication but, in many cases, will not redact my name.
- 15 [Confirmed via box check]
- 16 • Signed on the date of: 21 Jan 2023
- 17 • By: Nilo Siqueira

18 4. Mr. Siqueira received a confirmation of receipt of this submission from  
 19 the address [removals@google.com](mailto:removals@google.com) on January 23, 2023. Attached hereto as Exhibit  
 20 1 is a true and correct copy of the confirmation receipt received from Google.  
 21 Mr. Siqueira was authorized to act on behalf of MVL in submitting this notification.

5. The purpose for which the DMCA Subpoena is sought is to obtain the identity of an alleged infringer (or infringers) and such information will only be used for the purpose of protecting MVL's rights under title 17 U.S.C. §§ 100, *et seq.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information or belief.

Executed at Burbank, California, on March 7, 2023.

  
Matthew Slatoff

# **Exhibit 1**

